

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Spartanburg County
Honorable R. Ferrell Cothran, Circuit Court Judge

KENNETH JOWAN CRAIG,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

Appellate Case No. 2017-001616

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for Kenneth Jowan Craig respectfully requests a **final thirty (30) day extension, until March 19, 2018**, in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a third request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be filed with the Court today. The Court has granted counsel two previous extensions.

2. Counsel for Kenneth Jowan Craig respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the

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number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be required.

3. Counsel filed the Brief of Petitioner in the case of In the Matter of the Care and Treatment of Daryl T. Snow with this Court on February 12, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Henry James Ross, Jr. v. State with this Court on February 8, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of State v. Vincent Missouri with this Court on February 5, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Jaycoby Terreak Williams with the Court of Appeals on January 30, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. John Anthony Singleton with the Court of Appeals on January 25, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Michael Anthony Bodison with the Court of Appeals on January 22, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Christopher Busch with the Court of Appeals on January 17, 2018. Counsel filed the initial brief of respondent and designation of matter in the case of In the Matter of the Care and Treatment of Gerald Barrett with the Court of Appeals on January 17, 2018. Counsel filed the Petition for Writ of Certiorari and accompanying appendix in the case of Gabriel Jon Rios v. State with this Court on January 16, 2018. Counsel assisted Chief Appellate Defender Robert M. Dudek with the reply to return to petition for writ of certiorari in the death penalty case of Ricky Lee Blackwell v. South Carolina, filed on January 11, 2018 with the Supreme Court of the United States. Counsel filed the initial brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Wake Hunt with the Court of Appeals on January 11, 2018. Counsel filed the Petition for Writ of Certiorari

in the case of James Junior Little v. State with this Court on January 4, 2018. Counsel filed the initial brief of appellant and designation of matter in the case of State v. Charles Alton Morehouse with the Court of Appeals on January 2, 2018. Counsel filed the brief of petitioner in the case of State v. James Kevin Bethel with this Court on December 15, 2017. On December 13, 2017, counsel was present to testify in circuit court before the Honorable Clifton Newman in the PCR matter of Stewart Ard v. State, pursuant to a subpoena from the Attorney General.

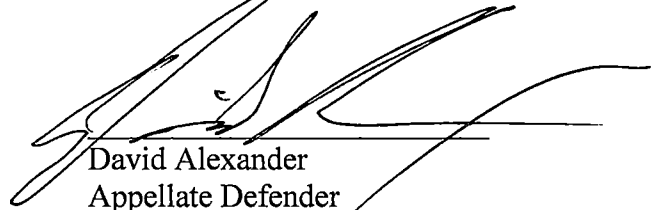
4. Counsel makes this request in good faith and not for purpose of delay.

5. Counsel for the Attorney General's office consents to this request as shown by

signature below.

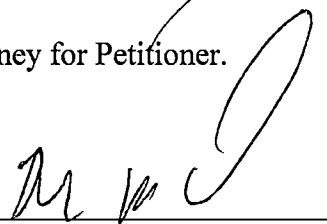
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension, until March 19, 2018**, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition be held in abeyance pending a ruling on this motion.

Respectfully submitted,



David Alexander
Appellate Defender

Attorney for Petitioner.



Robert M. Dudek
Chief Appellate Defender

This 15th day of February, 2018.

I consent:



for Valerie Garcia Giovanoli, Esquire